

1 JASON D. SMITH, ESQ.
2 Nevada Bar No. 9691
3 JESSICA M. LUJAN, ESQ.
4 Nevada Bar No. 14913
5 HOLLEY DRIGGS
6 300 S. Fourth Street, Suite 16
Las Vegas, NV 89101
Email: jsmith@nevadafirm.com
jlujan@nevadafirm.com
Telephone: 702-791-0208
Facsimile: 702-791-1912

7 *Attorneys for Defendant*
R&G HOLDINGS, LLC

8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JOHN MEGGS,

12 Plaintiff,

13 v.

14 R&G HOLDINGS, LLC, LE PRIVE
15 HOSPITALITY, LLC and SHINJUKU, LLC

16 Defendants.

17 Case No. 2:23-cv-01051-APG-BNW

18 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT R&G HOLDINGS, LLC TO
RESPOND TO PLAINTIFF'S
COMPLAINT
(First Request)**

19 Defendant R&G HOLDINGS, LLC, by and through its counsel of record, the law firm
20 HOLLEY DRIGGS, and Plaintiff JOHN MEGGS, by and through his counsel of record, the law
firms the LAW OFFICES OF ROBERT P. SPRETNACK and GARCIA-MENOCAL & PEREZ,
21 P.L. (*Pro Hac Vice*) hereby stipulate as follows:

22 R&G HOLDINGS, LLC's response to Plaintiff's Complaint (ECF No. 1) is currently due
23 September 5, 2023. R&G Holdings, LLC requests additional time to investigate the claims made
24 in Plaintiff's Complaint and defenses thereto. The parties stipulate that Defendant R&G
25 HOLDINGS, LLC may have an extension of time to file a responsive pleading to Plaintiff's
26 Complaint up and through September 26, 2023.

1 This is the parties' first request for an extension of R&G HOLDINGS, LLC's time to
2 respond to Plaintiff's Complaint and is made in good faith and not for any purposes of delay.

3 **STIPULATED AND AGREED BY ALL PARTIES.**

4 Dated: August 30, 2023.

5 By: /s/ Jason D. Smith

6 Jason D. Smith (NV Bar No. 9691)

7 Jessica M. Lujan (NV Bar No. 14913)

8 **HOLLEY DRIGGS**

9 300 South Fourth Street, Suite 1600

10 Las Vegas, Nevada 891001

11 Tel.: (702) 791-0308 / Fax: (702) 791-1912

12 Email: jsmith@nevadafirm.com

13 jlujan@nevadafirm.com

14 *Attorneys for Defendant R&G Holdings,
15 LLC*

16 By: /s/ Robert P. Spretnak , Esq.

17 Robert P. Spretnak (NV Bar No. 5135)

18 **THE LAW OFFICES OF ROBERT P.**

19 **SPRETNAK**

20 8275 South Eastern Avenue, Suite 200

21 Las Vegas, Nevada 89123

22 Tel.: (702) 494-4000 / Fax: (702) 938-1055

23 Email: bob@spretnak.com

24 */s/ Anthony Perez, Esq. (pro hac vice)*

25 **GARCIA-MENOCAL & PEREZ, P.L.**

26 3550 Sevilla Avenue, Suite 200

27 Coral Gables, FL 33134

28 Tel.: (305) 553-3464 / Fax: (305) 553-3031

29 Email: ajperez@lawgmp.com

30 *Attorneys for Plaintiff*

31 **ORDER**

32 **IT IS SO ORDERED**

33 **DATED:** 2:08 pm, September 01, 2023

34 

35 **BRENDA WEKSLER**
36 **UNITED STATES MAGISTRATE JUDGE**